

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

JOHN E. JAUNICH, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

STATE FARM LIFE INSURANCE  
COMPANY,

Defendant.

Case No. 20-1567 (PAM/BRT)

**STIPULATION RE  
MODIFICATION OF CLASS  
CERTIFICATION BRIEFING  
SCHEDULE**

The parties hereby stipulate that the Court should modify the Amended Scheduling Order (Dkt. 37, 47), to (1) extend the date by which State Farm Life Insurance Company must file its response brief to a motion for class certification (including class certification expert disclosures) by 10 days, from July 26, 2021 to August 5, 2021; and (2) extend the date by which Plaintiff must file his reply brief in support of his motion for class certification (including class rebuttal certification expert disclosure) by 7 days, from September 7, 2021 to September 14, 2021. These deadlines have been amended once, previously. (Dkt. 47).

Per Local Rule 16.3, good cause exists for the proposed modification. Specifically, State Farm sought to depose Plaintiff, in person, on June 22, 2021. Plaintiff informed State Farm that he would be available on June 28, 2021, and State Farm noticed the deposition for that date. Thereafter, Plaintiff indicated that he would be out of town and unavailable

until July 6, 2021. Subsequently, after State Farm agreed to move the deposition to July 6, Plaintiff indicated he would not be available until July 7. Due to a conflict on July 7, involving State Farm's counsel, the Parties have agreed to move the deposition to July 9, 2021.

In light of the moved deposition, counsel have conferred cooperatively and agreed to the slight modification of the schedule, as set forth herein. No deadlines, except for those referenced in this stipulation, will be impacted by this stipulated modification, and the proposed deadlines satisfy the requirements set forth in the Court's Order on Dispositive Motions (Dkt. 15).

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

Dated: June 25, 2021

Respectfully submitted,

**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

/s/Karen Hanson Riebel

Karen Hanson Riebel (MN # 0219770)

Maureen Kane Berg (MN #033344X)

100 Washington Avenue South

Suite 2200

Minneapolis, MN 55418

Telephone: (612) 339-6900

Facsimile: (612) 339-0981

khriebel@locklaw.com

mkberg@locklaw.com

*Local Counsel for Plaintiff John E. Jaunich*

**MILLER SCHIRGER LLC**

/s/ Joseph M. Feierabend

John J. Schirger, MO # 60583 (*pro hac vice*)  
Matthew W. Lytle, MO #59145 (*pro hac vice*)  
Joseph M. Feierabend, MO #62563 (*pro hac vice*)  
4520 Main Street, Suite 1570  
Kansas City, MO 64111  
Telephone: (816) 561-6500  
Facsimile: (816) 561-6501  
jschirger@millerschirger.com  
mlytle@millerschirger.com  
jfeierabend@millerschirger.com

**STUEVE SIEGEL HANSON LLP**

Norman E. Siegel, MO # 37682 (*pro hac vice*)  
Ethan Lange, MO # 67857 (*pro hac vice*)  
Lindsay Todd Perkins, MO # 60004 (*pro hac vice*)  
460 Nichols Road, Suite 200  
Kansas City, Missouri 64112  
Telephone: 816-714-7100  
Facsimile: 816-714-7101  
siegel@stuevesiegel.com  
lange@stuevesiegel.com  
perkins@stuevesiegel.com

**MORGAN & MORGAN**

John Yanchunis FL # 324681 (*pro hac vice*)  
201 N Franklin Street, 7<sup>th</sup> Floor  
Tampa, Florida 33602  
Telephone: 813-275-5272  
Facsimile: 813-222-4736  
JYanchunis@ForThePeople.com

*Attorneys for Plaintiff John E. Jaunich*

/s/ Todd A. Noteboom

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Todd A. Noteboom (#0240047)  
STINSON LLP  
50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: 612.335.1500  
Facsimile: 612.335.1657  
E-mail: todd.noteboom@stinson.com

Jeremy A. Root  
Admitted pro hac vice  
STINSON LLP  
230 W. McCarty Street  
Jefferson City, MO 65101  
Telephone: 573.556.3609  
Facsimile: 573.556.3635  
Email: jeremy.root@stinson.com

*Attorneys for Defendant State Farm Life  
Insurance Company*